



Halliburton NUS
CORPORATION

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January 6, 1995

Halliburton NUS Project No. 8P06

Mr. Gary McSmith
Department of the Navy
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street, Code 18234
Norfolk, Virginia 23511-2699

Reference LANTDIV Contract No. N62470-90-D-7630

Subject: MCALF, Bogue Field, North Carolina
Site 29 - Crash Crew Burn Pit
Draft Phase II RI Report

Dear Mr. McSmith:

Halliburton NUS is submitting two (2) copies of the Draft Phase II RI report for Site 29 at Bogue Field for your review and comment. Two (2) copies have been sent directly to Ms. Reneé Henderson at MCAS Cherry Point for her review and comment. Review comments are required before the close of business on January 13, 1995, in order to meet the January 19, 1995 date for submittal of the draft final report.

In regards to the content of the report, the recommendation was made to pursue corrective action under Section L (degradation/attenuation) of North Carolina Regulation 15A NCAC 2L for site-related contaminants; to pursue an exemption for meeting groundwater standards under Section K (relaxing groundwater standards) for non-site-related contaminants; and to continue monthly free product thickness and removal until all product is removed. No further action for soils has also been recommended. These recommendations were made based on an initial review of the subject regulation, and we are presently in the process of researching the applicability of this approach further. I will keep you informed of any new information which may affect this issue.

It should also be noted that a Site Sensitivity Evaluation has been conducted as required by the State of North Carolina document "Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater, March 1993, revised June 1993." As required on page 18 of the document, the site has been designated Category E, based on the fact that no known water supply wells are contaminated or within 1,500 feet of the site, the area is served by accessible public water supply, and no vapors are present in confined areas at explosive or health concern levels. This belief is supported by the fact that no explosive vapors were noticed during monitoring of boreholes with an lower-explosive limit/oxygen meter while drilling activities were conducted, and no structures are present at the site which could create the avenue for the accumulation of vapors in confined areas.

However, during the preparation for the BRAC Site 7 Characterization Report for MCAS Cherry Point, the State of North Carolina had required that BRAC Site 7 be designated Category A; since floating product exists on the water table and it was assumed by the state that the floating product would cause

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vapors to be present in confined areas. The State may apply this same philosophy to Bogue Field. However, no written requirement to this effect can be found in the reference document. Page 18 of the reference document indicates that a site is designated Category A when "vapors are present in confined areas at explosive or health concern levels."

The point indicating that no explosive vapors or subsurface structures were observed during the RI has not been included in this draft version of the report to refute a designation of Category A, since it is not known if this will be an issue with the State of North Carolina. However, at your request, Halliburton NUS can either: designate the site Category A; include this supporting information in the draft final version of the RI, or be prepared to defend this position in the event that the state disputes the designation.

If you have any questions, please give me a call at (412) 921-8418.

Very truly yours,



Matthew G. Cochran, P.G.
Project Manager

MCG/blb

Attachments

c: N. Straub (w/enclosure)
File 8P06 (w/o enclosure)